

BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

CONSUMER ADVOCATE DIVISION)

vs.)

BELLSOUTH TELECOMMUNICATIONS,)
INC.)

Docket No. 00-00041

Tariff 00-00041

MOTION TO SUBMIT SUPPLEMENTAL ISSUES

Comes the Consumer Advocate Division on behalf of Tennessee consumers to respectfully move to submit supplemental issues. For cause the division would show:

1. That BellSouth's response to the Consumer Advocate Division's complaint was apparently filed by BellSouth on March 3, 2000 and was only received by the Consumer Advocate Division on March 8, 2000.
2. That counsel for the Consumer Advocate Division only had time for a cursory review of BellSouth's answer prior to the time submission of the issues was due and that the notice for submission of issues did not specify how issues arising from documents filed in such proximity to the submittal of issues date would be handled.
3. That the acceptance of the supplemental issues in this time frame is reasonable and does not prejudice any party.

SUPPLEMENTAL ISSUES RAISED BY BELLSOUTH'S ANSWER

1. DOES BELLSOUTH'S PROPOSAL REMOVE THE AMOUNTS CHARGED IN BASIC LOCAL EXCHANGE SERVICE RATES FOR LATE PAYMENT EXPENSES FROM THE BASIC LOCAL EXCHANGE SERVICE RATES OF ALL PERSONS OR BUSINESSES WHO DO NOT CAUSE THE LATE PAYMENT COSTS?
2. IF THE LATE PAYMENT CHARGE IS APPROVED, SHOULD BOTH RESIDENTIAL AND BUSINESS BASIC LOCAL EXCHANGE SERVICE

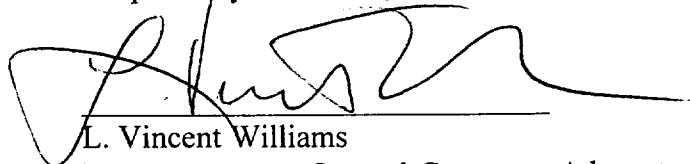
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CUSTOMERS BE PROTECTED FROM CONTINUING TO PAY AS IF THEY ARE LATE PAYMENT COST CAUSERS, WHEN THE REVENUES THEY PAY WHICH ARE ASSOCIATED WITH LATE PAYMENTS, WOULD BE APPORTIONED BY BELLSOUTH TO BUSINESS NON-BASIC SERVICE HUNTING AND GROUPING CHARGES?

3. DID THE GENERAL ASSEMBLY LIMIT THE POWER OF THE TENNESSEE REGULATORY AUTHORITY TO CHANGE THE LEGISLATIVELY CREATED PLAN OR TO CREATE OR DENY SUBSTANTIVE RIGHTS?
4. DOES BELLSOUTH'S LATE CHARGE PROPOSAL AMEND, ALTER, ENLARGE OR LIMIT THE TERMS OF OPERATION OF TENN. CODE ANN. §§ 65-5-208 (a) AND TENN. CODE ANN. § 65-5-209 OR SUBSTITUTE BELLSOUTH'S JUDGMENT FOR THAT OF THE GENERAL ASSEMBLY?
5. IS THE TENNESSEE REGULATORY AUTHORITY PROHIBITED FROM AMENDING, ALTERING, ENLARGING, OR LIMITING THE TERMS OR OPERATION OF TENN. CODE ANN. § 65-5-208 (a)(1) OR TENN. CODE ANN. § 65-5-209 OR OR SUBSTITUTING ITS JUDGMENT FOR THAT OF THE LEGISLATURE IN ADMINISTERING A PRICE REGULATION PLAN?
6. DID THE TENNESSEE REGULATORY AUTHORITY IN DOCKET NO. 96-01422 AUTHORIZE BELLSOUTH TO ALLOCATE REVENUES AND CHARGES ASSOCIATED WITH BASIC LOCAL EXCHANGE SERVICE TO NON-BASIC SERVICE?

Wherefore the Consumer Advocate Division prays that its Motion to accept supplemental issues be granted.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L. Vincent Williams", is written over a horizontal line.

L. Vincent Williams
Deputy Attorney General-Consumer Advocate
Consumer Advocate Division
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615-741-8723

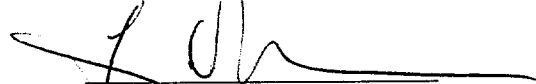
B.P.R. No. 011189

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Document has been mailed postage prepaid to the parties listed below this 16th day of March, 2000.

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D. Vincent Williams